

REMARKS**I. INTRODUCTION**

In response to the Office Action dated May 4, 2007, no claims have been canceled, amended or added. Claims 1-14 remain in the application. Re-examination and re-consideration of the application is requested.

**II. PRIOR ART REJECTIONS****A. The Office Action Rejections**

On pages (2)-(3) of the Office Action, claims 12 and 14 were rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,131,809 (Drescher). On pages (3)-(8) of the Office Action, claims 1-11 and 13 were rejected under 35 U.S.C. §103(a) as being obvious in view of the combination of U.S. Patent No. 6,484,380 (Graef) in view of U.S. Patent No. 6,029,971 (Lynch).

Applicants' attorney respectfully traverses these rejections.

**B. The Drescher Reference**

Drescher describes an automated banking machine (10) that identifies and stores documents such as currency bills deposited by a user. The machine then selectively recovers documents from storage and dispenses them to other users. The machine includes a central transport (70) wherein documents deposited in a stack are unstacked, oriented and identified. Such documents are then routed to storage areas in recycling canisters (92, 94, 96, 98). When a user subsequently requests a dispense, documents stored in the storage areas are selectively picked therefrom and delivered to the user through an input/output area (50) of the machine. The control system (30) for the machine includes a terminal processor (548). The terminal processor communicates with a module processor (552). The module processor (552) communicates with module controllers (554, 556, 558, 560, 562 and 564) which control the operation of devices. The module processor coordinates the activities of the module controllers to achieve the processing of documents reliably and at high speeds. A special protocol is used to communicate messages between the module processors and module controllers which provides increased reliability.

C. The Graef Reference

Graef describes an automated banking machine (10) including sheet dispensing mechanisms (34, 36, 38, 40). Each sheet dispensing mechanism includes a picking member (72). The picking member rotates, with each rotation generally causing one sheet to be picked from a stack (42) of sheets. The picking member includes movable engaging portions supported on arcuate segments (128, 144). The engaging portions move radially outward to apply additional moving force to an end note bound in the stack responsive to movement of the picking member exceeding the movement of the end note. Sheets are carried in the machine by a transport (54) including a plurality of belt flights (174, 176, 178). Sheets are carried between the belt flights and projecting member portions (180, 182). At least one of the belt flights includes a plurality of longitudinally spaced projections (194, 200, 204, 207) on a sheet engaging surface thereof. The projections provide improved engagement with sheets moving in the transport enabling more reliable movement of sheets.

D. The Lynch Reference

Lynch describes a belt displacement operation periodically carried by the pick mechanism 11 of a sheet feeding apparatus, when the number of sheets fed has reaches a predetermined value. The motor 34 is driven in reverse for a predetermined time, so as to cause rotation of the belt 28 in the opposite direction to that during feeding. Since the pick pulley 26 is supported on the shaft 38 by means of a one-way clutch 40 so that it does not rotate during the reverse rotation of the belt 28, displacement of the belt 28 occurs relative to the pick pulley 26, so that in subsequent pick operations, a different portion of the belt 28 engages the stack 18 so as to pick a sheet, than had displacement of the belt 28 not occurred. This reduces the risk of localized portions of the belt 28 becoming more worn than others, due to more frequent engagement with the stack 18.

E. The Applicants' Invention is Patentable Over the References

1. The rejection of claims 12 and 14 under 35 U.S.C. §102(e) as being anticipated by Drescher

Applicants' independent claim 12 distinguishes over Drescher because it recites a media module for use in a self-service terminal, the media module comprising: (a) means defining a

media transport path; (b) a plurality of media containers; and (c) a friction pick mechanism associated with each media container within the media module for picking media from the media container and transferring the picked media to the media dispense path for transporting the picked media from the media module.

Similarly, Applicants' independent claim 14 distinguishes over Drescher because it recites a method of dispensing media from a self-service terminal, the method comprising the steps of: (a) selectively removing media from one of a plurality of media containers disposed within a media module, wherein each of the media containers within the media module include a friction pick mechanism associated with each media container for picking media from the media container and transferring the picked media to a media dispense path for removing the picked media from the media module; and (b) presenting the removed media to a user.

The Office Action, on the other hand, states that Applicants' claims 12 and 14 are anticipated by Drescher:

Claims 12 and 14 are rejected under 35 U.S.C. 102(e) as being anticipated by Drescher et al (hereinafter Drescher US PAT 6,131,809

Re Claim 12: Graef [sic: Drescher] discloses a media module for use in a self-service terminal, the media module comprising:

Means defining a media dispense path (See Fig 1, and Column 27 line 21- Column 29, line 59)

A plurality of media containers (Fig 1, Refs 100, 102, 104 and 106: Column 11, lines 41-52)

A friction pick mechanism associated with each media container within the media module for picking media from the media container (Column 11, lines 53-65; Column 28, lines 1-22) and transferring the picked media to the media dispense path (Column 29, lines 10-20) for transporting media from the media dispensing module (Column 29, lines 15-20)

Re Claim 14: Graef [sic: Drescher]discloses a method of dispensing media from a self-service terminal, the method comprising the steps of:

Selectively removing media from one of a plurality of media containers disposed within a media module, wherein each of the media containers within the media module includes a friction pick mechanism for picking media from the media container and transferring the picked media to a media dispense path for removing the media from the media module (See Fig 1, and Column 27 line 21- Column 29, line 59)

Presenting removed media to a user (Column 30, lines 35-40)

Applicants' attorney disagrees.

For example, consider the storage areas labeled as 100, 102, 104 and 106 of canister 94 as shown in FIG. 1 of Drescher:

### Drescher's FIG. 1

U.S. Patent Oct. 17, 2000 Sheet 1 of 78 6,131,809

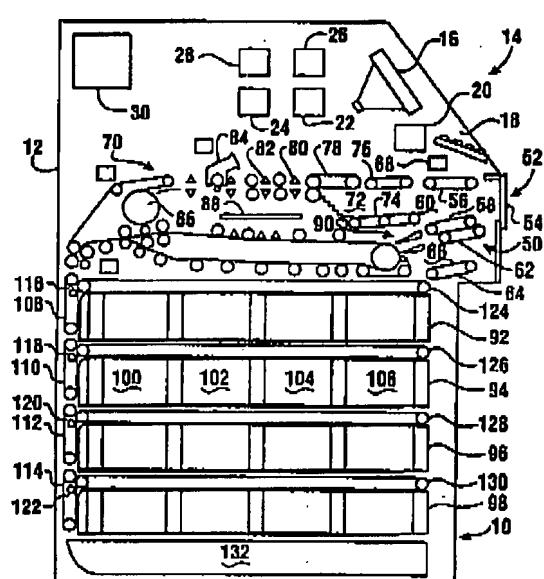
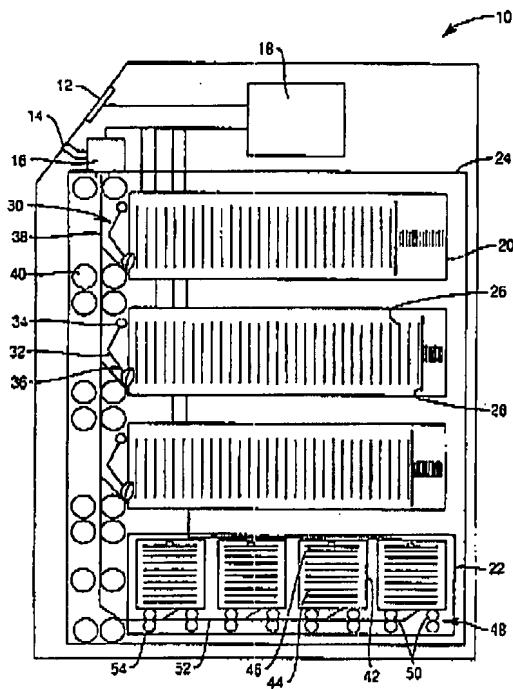


FIG. 1

Contrast this to media module 22 of Applicants' FIG. 1, which contains a plurality of media containers 42, each with its own friction pick mechanism 48:

Applicants' FIG. 1



Drescher shows separate storage areas 100, 102, 104 and 106 within a canister 94, but not separate media containers within a media module, as recited in Applicants' claims.

Moreover, these separate storage areas 100, 102, 104 and 106 of Drescher share a common canister delivery transport 126, whereas Applicants' claims recite separate pick mechanisms for each media container.

Thus, Applicants' attorney submits that independent claims 12 and 14 are allowable over Drescher. Further, dependent claim 13 is submitted to be allowable over Drescher in the same manner, because it is dependent on independent claim 12, and thus contains all the limitations of independent claim 12. In addition, dependent claim 13 recites additional novel elements not shown by Drescher.

2. The rejection of claims 1-11 and 13 under 35 U.S.C. §103(a) as being obvious in view of the combination of Graef and Lynch

Applicants' independent claim 1 discloses a self-service terminal comprising: a plurality of media modules, each media module being operatively associated with a pick mechanism for picking media from the media module and transferring the picked media to a media dispense

path, at least one of the media modules being associated with a vacuum pick mechanism, and at least one other of the media modules being associated with a friction pick mechanism.

Applicants' independent claim 6 discloses a self-service terminal comprising: means defining a media dispense path; a vacuum pick mechanism; a friction pick mechanism; and a plurality of media modules, each media module being operatively associated with a pick mechanism for picking media from the module and transferring the picked media to the media dispense path, at least one media module being associated with the vacuum pick mechanism and at least one other media module being associated with the friction pick mechanism.

The Office Action admits Graef does not teach the elements of claims 1 and 6 directed to at least one module being associated with a vacuum pick mechanism. However, the Office Action, states the following:

Claims 1-11 and 13 are rejected under 35 U.S.C. 103(a) as being unpatentable over Graef in view of Lynch et al (hereinafter Lynch, US 6,029,971).

Re Claim 1: Graef discloses a self-service terminal comprising:

A plurality of media modules (Fig 1, 44, 46, 48, 50; Column 7, lines 42-52)), each module operatively associated with a pick mechanism for picking media from the module (Fig 1, 34, 36, 38, 40; Column 7, lines 26-41) and transferring the picked media to a media dispense path (Column 7, lines 53-62), wherein at least one of the modules being associated with a friction pick mechanism (See Fig 2 and description Column 8 line 39-Column 10 line 50; cites friction portions of picking mechanism)

In addition, Graef notes that ATMs can be used to dispense a variety of different medias including cash, tickets, scrip, vouchers or other documents (Column 1, lines 18-35). Furthermore, Graef discloses that the modules may hold a variety of different types of documents in the same machine (Column 7, lines 46-48).

Graef does not explicitly disclose at least one module being associated with a vacuum pick mechanism. Lynch discloses that sheet feeding apparatus, such as the one disclosed by Graef "are commonly of either the vacuum pick or friction pick type," and depending on the type of media involved cites the advantages and disadvantages for each (Column 1, lines 5-20). Some media as Lynch points out is better served with a friction mechanism (medias that need a high feed rate), while other media would be better served with a vacuum mechanism (high porous). Thus, it would have been obvious to anyone of ordinary skill at the time of invention to include the teachings of Lynch to the disclosure of Graef so that an ATM containing multiple media types, can distribute the different types of media in the most efficient and practical way possible.

\* \* \*

Re Claim 11: Graef discloses a self-service terminal comprising:

- Means defining a media dispense path (Fig 1, See arrows related to Refs 54,56,60 and 62)
  - A number of media modules, at least one media module including a plurality of media containers (Fig 1; 44, 46, 48, and 50) and a friction pick mechanism operatively associated with each media container for picking media from the media container (Fig 1, 34, 36, 38, 40) and transferring the picked media to the media dispense path (Fig 1, Ref 54, 56)

Graef does not explicitly disclose wherein the media dispensing modules are removable, however Lynch discloses a self service terminal wherein the modules are removable (Column 2, lines 59-62). It would have been obvious to anyone of ordinary skill in the art at the time of invention to include the teachings of Lynch to the disclosure of Graef so that said modules can be taken from the machine to either be refilled or taken to a remote location for deposit or reconciliation with records related to transactions at the machine.

Also, in response to Applicants' attorney previous amendments and arguments, the Office Action makes the following assertions:

#### Response to Arguments

Applicant's arguments filed 02/01/2007 have been fully considered but they are not persuasive.

With regards to applicants arguments that the examiner has used improper hindsight construction in combining the Graef and Lynch references, the examiner again respectfully disagrees. Applicant contends that Lynch does not teach that both friction type and vacuum type apparatus are present in the same self-service machine. This is simply not true. Lynch states that each sheet feeding apparatus is either the vacuum pick or friction pick type depending on the type of 'sheets' being handled. There is nothing that says the self-service machine as a whole may only contain one or the other, only the sheet feeding apparatus. Therefore, in a machine such as the one disclosed in Graef, where there are multiple sheet feeding apparatus (FIG 1) that dispense different types of documents including cash, tickets, vouchers, checks, receipts, etc (Graef Column 1, lines 18-35), a person of ordinary skill would choose different pick mechanisms for different sheet feeding apparatus.

There is simply no suggestion or teaching that the same machine cannot have both as asserted by the applicant. Rather the Lynch reference suggests the advantages of each type of mechanism depending on the document being dispensed. It is also pointed out that the applicant's specification states that each media module only has one type of pick mechanism (Page 5, vacuum pick module 20 and friction pick module 22). This is exactly what Lynch suggests as well.

Applicants' attorney asserts that it is not obvious to combine a vacuum pick and friction pick in one self service terminal.

Conventionally, a self service terminal will employ only one type of pick mechanism (see Applicants' specification at page 1, line 21). Lynch confirms this by teaching that sheet feeding apparatus may be either vacuum type or friction type. However, nowhere does Lynch teach that both friction type and vacuum type apparatus are present in the same self service machine.

Consequently, the Office Action's assertion applies hindsight and then assumes obviousness, when stating that the combination would have been obvious "it would have been obvious to anyone of ordinary skill at the time of invention to include the teachings of Lynch to the disclosure of Graef so that an ATM containing multiple media types, can distribute the different types of media in the most efficient and practical way possible." In fact, the combination of Graef and Lynch would teach away from Applicants' claims 1 and 6.

For example, Graef describes an automated banking machine where each sheet dispensing mechanism includes a friction picking member. Lynch describes a pick mechanism that may be either a vacuum type or friction type pick mechanism. Therefore, a person of ordinary skill in the art, upon reading Graef and Lynch, would construct a self service terminal with one type of picking mechanism. Applicants' claims, on the other hand, recite a self service terminal having both kinds of picking mechanisms in a single self-service terminal - namely, both a vacuum pick mechanism and a friction pick mechanism.

Thus, Applicants' attorney submits that independent claims 1 and 6 are allowable over Graef in view of Lynch. Further, dependent claims 2-5 and 7-10 are submitted to be allowable over Graef in view of Lynch in the same manner, because they are dependent on independent claims 1, and 6, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-5 and 7-10 recite additional novel elements not shown by Graef in view of Lynch.

Dependent claims 2 and 7 recite a self-service terminal of claim 1 and 6, respectively, wherein the modules are removable and interchangeable. The Office Action asserts that Lynch describes removable modules and admits that neither reference teaches interchangeable modules, but asserts that these limitations are obvious. Applicants' attorney submits the indicated location does not describe removable modules and that these limitations are not obvious in the context of

having both types of pick mechanisms associated with the media modules, with the media modules still being interchangeable.

Dependent claims 3 and 8 recite a self-service terminal of claims 1 and 6, respectively, wherein the friction pick mechanism is contained within the friction pick module. The Office Action incorrectly states that Graef teaches a friction picking mechanism contained within a friction picking module. Rather, Graef teaches a sheet dispensing mechanism adjacent to canisters for housing sheets (see Graef at col. 7, lines 25-45 and FIG. 1).

Dependent claims 4 and 9 recite a self-service terminal of claims 3 and 8, respectively, wherein the friction pick module comprises a plurality of friction pick units, each unit including a media container and a friction pick mechanism. The Office Action incorrectly states that Graef teaches a friction pick module. Nor does Graef teach a friction pick module comprising a plurality of friction pick units, labeled as 42 in Applicants' FIG. 1 shown above. Instead, the Office Action states that canisters 44, 46, 48 and 50 in Graef's FIG. 1 are equivalent to a media container. However, the canisters of Graef are not equivalent to media containers, and thus Graef does not teach or suggest a plurality of friction pick units, each unit including a media container and a friction pick mechanism.

Dependent claims 5 and 10 recite the self-service terminal of claims 4 and 9, respectively, wherein the friction pick units share a common media exit path which is within the media module and leads to the media dispense path. Graef does not teach a media module as recited in Applicants' claims 4 and 9, and there is no common media exit path within a canister of Graef.

Applicants' independent claim 11 recites a self-service terminal comprising means defining a media dispense path, and a number of removable media modules, at least one media module including a plurality of media containers and a friction pick mechanism operatively associated with each media container for picking media from the media container and transferring picked media to the media transport path. As noted above, none of these elements are taught or suggested by Graef. Moreover, the cited location in Lynch does not describe removable modules, and Lynch does not disclose the same media modules or media containers as recited in Applicants' claim 11.

Dependent claim 13 teaches a media dispensing module according to claim 12, further comprising means for enabling the media dispensing module to be removable and interchangeable in a self-service terminal. The Office Action admits the references do not

disclose modules that are interchangeable, but argues it would be obvious to one of ordinary skill in the art to make interchangeable modules. Applicants' attorney submits that, since a self service terminal with both vacuum pick and friction pick modules did not exist before Applicants' invention, it is not obvious to make a friction pick module and a vacuum pick module interchangeable with each other.

### III. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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